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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GEOFF WINKLER, as court-appointed
receiver for J&J Consulting Services, Inc.,
an Alaska corporation; J&J Consulting
Services, Inc., a Nevada corporation; and J
and J Purchasing LLC, Florida limited
liability company,

Plaintiff,

v.

WELLS FARGO BANK, N.A.,

Defendant.

Case No.: 2:23-cv-00703

**STIPULATION FOR EXTENSION OF
TIME TO FILE AMENDED
DISCOVERY PLAN
(First Request)**

Pursuant to Local Rule IA 6-1, the parties hereby stipulate, subject to this Court's approval, to a three-day extension of time to file an amended discovery plan, and state as follows:

WHEREFORE, on July 28, 2023, the Court ordered that the parties file an amended discovery plan by August 2, 2023 [Docket No. 39]. The Court directed the parties to explain the length of the proposed schedule and address the coordination of the schedule in this action with the schedule in the related class action, *In re J&J Investment Litigation*, No. 2:22-cv-00529-GMN-NJK (D. Nev.);

WHEREAS, the parties respectfully submit that good cause exists to extend the deadline to file an amended discovery plan by three days to address the Court's direction to reconcile the differences between the schedules in this case and the class action. These discussions necessarily involve counsel for the class plaintiffs. In the past 48 hours, the parties have engaged in telephone and e-mail communications on the issue, including communications with class counsel, and have circulated a proposed schedule. The parties believe it will be productive to continue those efforts before filing their amended discovery plan; and

WHEREAS, this is the first motion to extend the time to file an amended discovery plan;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between the Parties by and through their counsel, subject to the Court's approval, that the parties file their amended discovery plan and proposed scheduling on or before August 7, 2023.

~~PROPOSED~~ ORDER

IT IS SO ORDERED.

Dated: August 3, 2023



Honorable Nancy J. Koppe
United States Magistrate Judge

Dated: August 2, 2023

Respectfully submitted,

SEMENZA KIRCHER RICKARD

By: /s/ K. Issac deVyver

/s/ Jarrod Rickard

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